

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 18-150(1) (DWF/HB)
	)	
Plaintiff,	)	<b>DEFENDANT’S THIRD MOTION FOR EXTENSION OF TIME TO FILE POSITION PLEADINGS</b>
v.	)	
	)	
MICHAEL HARI,	)	
	)	
Defendant.	)	

Michael Hari, by and through counsel, respectfully moves the Court for an order extending the time limits under the Local Rules in which pleadings with respect to sentencing procedures are due. The positions on sentencing are currently due on August 2, 2021 and a 9-day extension until August 11, 2021 is respectfully sought.

The federal court’s closure until May 1, 2021 due to the COVID-19 pandemic has delayed many hearings, sentencings, and trials. Undersigned Counsel has been inundated with these hearings, in addition to completing numerous memoranda and pleadings. Counsel submitted briefing in this case, as well as briefs or sentencing pleadings in *United States v. Beaulieu* (20-CR-235 ECT/LIB), *United States v. Chineth* (21-CR-16 SRN/KMM), *United States v. Jackson* (20-CR-133 PJS/DTS), *United States v. Haji* (19-CR-292 WMW/KMM) and others. Thus, counsel has had insufficient time to prepare this pleading and requests a little more time to do so.

For these reasons, Counsel respectfully requests an extension for the submission of position pleadings until August 11, 2021. The government does not object to this extension as long as it applies to both parties.

This motion is based on all records, files and proceedings herein.

Dated: July 30, 2021

Respectfully submitted,

*s/ Shannon Elkins*

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